

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

ELIYAHU WEINSTEIN,
Petitioner,

v.

UNITED STATES,
Respondent.

Civil Action No. _____

DECLARATION OF CAROLINE POLISI, ESQ.

Pursuant to 28 U.S.C. § 1746, I, Caroline Polisi, declare as follows:

1. I am an attorney admitted to practice in the state of New York. I earned a Bachelor's degree from Yale University in 2004 and a Juris Doctor degree from Columbia Law School in 2008. From 2008-2010, I was an associate of Paul, Weiss, Rifkind, Wharton & Garrison LLP in New York. From 2011 to 2017, I was an associate of Creizman LLC in New York.

2. On August 14, 2013, Eric Creizman filed an appearance as counsel of record for Eliyahu Weinstein in *United States v. Weinstein*, 11-CR-701 (JAP) ("Weinstein I"). On August 27, 2013, I filed an appearance for Mr. Weinstein as Attorney Criezman's associate in that case.

3. On August 20, 2013, Attorney Creizman filed an appearance as counsel of record for Eliyahu Weinstein in *United States v. Weinstein*, Mag. No. 13-8148 (later,

14-CR-219 (JAP)) (“Weinstein II”). On August 27, 2013, I filed an appearance for Mr. Weinstein as Attorney Creizman’s associate in that case.

4. On September 4, 2013, Attorney Creizman filed a letter requesting to continue a motion hearing scheduled before Judge Pisano on September 11, 2013 because Attorney Criezman was previously scheduled to be on trial in New York that day. The docket does not reflect any ruling by the Court on that request prior to the hearing date.

5. On September 11, 2013, I appeared at the motion hearing to represent Mr. Weinstein. Attorney Creizman was unable to attend because, as noted, he was on trial in New York.

6. At the hearing, Judge Pisano asked me to his chambers *ex parte*, ostensibly to discuss Attorney Creizman’s schedule. During that conversation, Judge Pisano told me in a condescending tone that I seemed like a “nice person” but he observed that Attorney Creizman and I did not regularly practice in New Jersey.

7. Judge Pisano said words to the effect, “I don’t think you know what you are getting into with this guy . . . he is not a good guy.” My impression was that Judge Pisano was trying to dissuade me from continuing my representation of Mr. Weinstein.

8. Judge Pisano’s disdain for Mr. Weinstein was palpable. I was extremely disturbed by Judge Pisano’s comments. I was so upset by the incident that I called Attorney Creizman immediately afterwards to tell him what had happened, even though I knew he was on trial that day and would not otherwise have called him.

* * *

I declare under penalty of perjury that the foregoing is true and correct to the best of my knowledge, memory, and belief.

A handwritten signature in dark ink, reading "Caroline Polisi". The signature is written in a cursive style with a large initial 'C' and a distinct 'P'.

Caroline Polisi

Executed on January 19, 2018